

Marc J. Randazza, NV Bar No. 12265  
RANDAZZA LEGAL GROUP, PLLC  
4974 S. Rainbow Blvd., Ste. 100  
Las Vegas, NV 89118  
Telephone: 702-420-2001  
ecf@randazza.com  
  
Attorneys for Defendant  
Shelley Warneck

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHAEL C. STERNBERG,  
  
Plaintiff,  
  
v.  
  
SHELLEY WARNECK, et. al.,  
  
Defendants.

Case No. 2:23-cv-01466-APG-EJY

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

**First Request**

Plaintiff Michael C. Sternberg, Defendant Shelley Warneck, Defendant Tristan Aeschleman, and Defendant Adames & Ash, LLP (collectively, the “Parties”) hereby stipulate as follows:

1. Plaintiff filed his Complaint (ECF No. 1) on September 20, 2023.

2. Defendants Warneck, Aeschleman, and Adames & Ash, LLP returned signed waivers of service, and their deadline to respond to the Complaint is January 22, 2024.

3. Defendant Warneck has filed a Motion to Consolidate Cases (ECF No. 24) on January 3, 2024, seeking to consolidate this matter with the related case of *Sternberg v. Warneck*, No. 2:23-cv-02022-GMN-BNW.

4. Plaintiff intends to file an amended complaint adding causes of action in addition to those asserted in the Complaint.

5. For the sake of efficiency and conservation of resources of both the Court and the Parties, the Parties stipulate to extend Defendants Warneck, Aeschleman, and Adames & Ash, LLP's deadline to file a responsive pleading or motion to dismiss until 21 days after *both* (1) Plaintiff has filed an Amended Complaint *and* (2) the Court has decided the Motion to Consolidate Cases.

6. The Parties preserve and do not waive any claims, objections, or defenses of any kind by entry of this Stipulation, and this Stipulation does not operate as an admission against interest by any Party.

Wherefore, the Parties pray that the Court approve the terms of this Stipulation.

1 Dated: January 19, 2024.

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3 Respectfully Submitted,

4  
5 /s/ Marc J. Randazza

6 Marc J. Randazza, NV Bar No. 12265  
7 Randazza Legal Group, PLLC  
8 4974 S. Rainbow Blvd., Ste. 100  
9 Las Vegas, NV 89118  
10 Telephone: 702-420-2001  
11 ecf@randazza.com

12 Attorney for Defendant  
13 Shelley Warneck

14 /s/ Marc S. Cwik

15 Marc S. Cwik, NV Bar No. 006946  
16 6385 South Rainbow Blvd, Suite 600  
17 Las Vegas, NV 89118  
18 Telephone: 702-693-4374  
19 Marc.Cwik@lewisbrisbois.com

20 Attorney for Defendants  
21 Tristan Aeschleman and  
22 Adames & Ash, LLP  
23  
24  
25  
26  
27

/s/ Michael C. Sternberg

Michael C. Sternberg  
8545 W. Warm Springs Road, Ste. A4 #256  
Las Vegas, NV 89113  
sternberg\_michael@yahoo.com

Plaintiff, *Pro Se*

~~PROPOSED~~ ORDER

IT IS SO ORDERED: Defendant Shelley Warneck, Defendant Tristan Aeschleman, and Defendant Adames & Ash, LLP are not required to file a responsive pleading or motion to dismiss until 21 days after (1) Plaintiff has filed an Amended Complaint and (2) the Court has decided the Motion to Consolidate Cases.

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: January 19, 2023

Respectfully submitted,

/s/ Marc J. Randazza

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ecf@randazza.com

Attorney for Defendant  
Shelley Warneck